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Central Georgia EMC

923 S. Mulberry Street / Jackson, Georgia 30233 / Phone (770) 775-7857
 Fax (770) 775-3022 / www.cgemc.com

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U.S. Environmental Protection Agency
 Air Docket
 Mail Code 28221T
 1200 Pennsylvania Ave. NW
 Washington, DC 20460
 Attention: EPA Air Docket EPA-HQ-OAR-2013-0602

Subject: Docket ID No. EPA-HQ-OAR-2013-0602; Comments of Central Georgia EMC on Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Generating Units, 79 Fed. Reg. 34830 (June 18, 2014) (Proposed Rule) & 79 Fed. Reg. 64543 (October 30, 2014) (Notice of Data Availability).

I. Introduction

Central Georgia Electric Membership Corporation (CGEMC) is a not-for-profit consumer-owned electric distribution system. CGEMC meets the electric energy needs of members in fourteen Georgia counties, with approximately 52,000 billed accounts and over 5,367 miles of distribution lines. Central Georgia is a member of the Oglethorpe Power Corporation. Any costs that impact Oglethorpe Power Corporation will in turn impacts costs for CGEMC. CGEMC agrees with Oglethorpe Power's comments filed with the EPA.

II. Discussion

CGEMC sets forth the following remarks in relation to the EPA's Guidelines for Carbon Pollution Emission for Existing Stationary Sources. These comments are detailed in the Oglethorpe Power's comments:

- EPA's goal-setting methodology could result in significant stranded investments, which in turn would result in higher electricity rates for our Members (P. 16)
- EPA has significantly underestimated the costs of the proposal; NERA's estimates are significantly higher (P. 27-29)
- NERC has raised serious concerns about potential reliability risks (P. 26)
- EPA has not adequately addressed the differences between large utilities and smaller utilities such as Cooperatives (p. 18)
- EPA's treatment of Georgia's "under construction" nuclear, Vogtle units 3&4, is inequitable and misguided and would almost certainly result in higher electricity rates for our Members (P. 12, P. 35)

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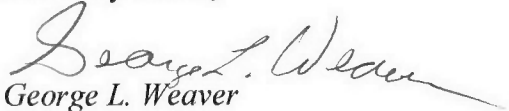
Attorney-Client Privileged Communication

- EPA's Energy Efficiency assumptions used in setting state goals are unrealistic (P. 47)

III. Conclusion

Central Georgia EMC appreciates the opportunity to provide EPA with comments to the proposed Clean Power Plan. Should you have any questions about these comments, please do not hesitate to contact me.

Sincerely Yours,


George L. Weaver
President